

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

In re:) Case No. 07-20188-JPK-7
HEARTLAND MEMORIAL HOSPITAL, LLC,) Chapter 11
Debtor.) Hon J. Philip Klingeberger

**DEBTOR'S OBJECTION TO MOTION OF SSFHS FOR
RELIEF FROM STAY AND ABANDONMENT OF REAL PROPERTY**

Heartland Memorial Hospital, LLC, debtor and debtor in possession in the above-captioned case (“Debtor”), by its attorneys, hereby responds in opposition to the Verified Motion of Sisters of St. Francis Health Services, Inc. (“SSFHS”) for Relief from Stay and Abandonment of Real Property (the “Motion”) and in support thereof, states as follows:

1. SSFHS seeks entry of an Order granting it relief from the automatic stay as to the Real Estate and the Personal Property, and directing the abandonment of the Real Estate and the Personal Property from Debtor’s estate.¹
2. Debtor objects to the relief sought.
3. Debtor and SSFHS have entered into an agreement to sell certain assets to SSFHS pursuant to an Asset Purchase Agreement between Heartland Memorial Hospital, LLC, as Debtor in Possession and Sisters of St. Francis Health Services, Inc. as Buyer. Whether the sale to SSFHS occurs will determine whether the relief requested by SSFHS is appropriate.

¹ Except as otherwise defined herein, all capitalized terms shall have the same meaning as provided in the Motion.

WHEREFORE, debtor Heartland Memorial Hospital LLC respectfully requests that the Court enter an order setting its Objection and the Motion for status following the date on which the Motion to Sell is heard and decided.

HEARTLAND MEMORIAL HOSPITAL, LLC

By: /s/ Paula K. Jacobi
One of its Attorneys

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